

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WILMINGTON DELAWARE

MR. JEFFREY ALONZO SIMMS #198625
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977
(PETITIONER)

V.

(DEFENDANTS)

warden THOMAS CARROLL,
OF: DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977;
AND HEALTH CARE MEDICAL
PROVIDER, C.M.S.
ARIZONA, BASE HEADQUARTERS.

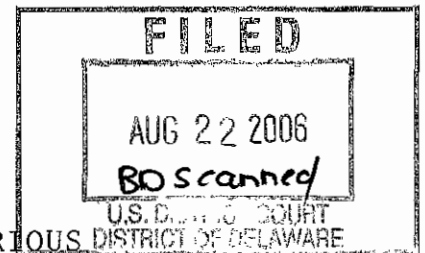
MS. DONNA REBURTHER BURNS M.D.
CHIEF DOCTOR OF DELAWARE STATE
CORRECTIONAL CENTER.

COMPLAINANT:

FILE; NUMBER ()

AUGUST 17 - 2006

THE ATTORNEY GENERAL
FOR THE STATE OF DELAWARE:
MR. CARL DAN BERGE
820 N. FRENCH STREET
WILMINGTON, DELAWARE 19801



PETITION FOR SERIOUS MEDICAL NEED PETITIONER MEDICAL CONDITION IS "SERIOUS"
IS A CRITICAL IN NEED OF HOSPITALIZATION AND DOCTOR, SUPERVISION

COMPLAINANT - THE PETITIONER COMES BEFORE THE CHIEF HONORABLE JUDGE
SUE L. ROBINSON, AND HONORABLE SERVANT MR. PETER T. DALLEO,
OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WILMINGTON
DELAWARE: LOCK BOX 18, 844 KING STREET, 19801-3570.

WARDEN THOMAS CARROLL IS IN VIOLATION: EIGHTH, FOURTEENTH, AMENDMENTS

PLEASE BE ADVISED, THE PURPOSE OF THE
PETITION: CRUEL AND UNUSUAL PUNISHMENT IN THE ADVERSE SUBSTANTIVE,
INADEQUATE, MEDICAL TREATMENT OF STATE PRISONER, IN THE ABOVE CAPTION
CASE, FURTHER-MORE THE PETITIONER MUST RELY ON PRISON AUTHORITIES
AT THE PENAL INSTITUTION TO TREAT THE PETITIONER MEDICAL NEEDS
HOWEVER AUTHORITIES FAIL TO DO SO, THE PETITIONER IS SUFFERING
SEVERE, DAMAGE BOTH KNEE CAP, MOSTLY LEFT;

THE PETITIONER SEEK RELIEF OF EMERGENCY
AND SUFFICIENT CARE EFFECTIVELY.

COMPLAINANT- PETITIONER

MR. JEFFREY ALONZO SIMMS #198625
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

(410-754-7760 PHONE)

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WILMINGTON DELAWARE

MR. JEFFREY ALONZO SIMMS #198625
 DELAWARE CORRECTIONAL CENTER
 1181 PADDOCK ROAD
 SMYRNA, DELAWARE 19977
 (PETITIONER)

FILE NUMBER(_____)

AUGUST 17-2006

PLEASE FILE

V.

(DEFENDANTS)

WARDEN, THOMAS CARROLL,
 OF, DELAWARE CORRECTIONAL
 CENTER 1181 PADDOCK ROAD
 SMYRNA, DELAWARE 19977
 AND HEALTH CARE MEDICAL,
 PROVIDER, C.M.S.
 ARIZONA, BASE HEADQUARTERS.

MS, DONNA REBURTHER BURNS, M.D.
 DOCTOR CHIEF OF STAFF OF
 THE DEPARTMENT OF CORRECTION
 OF THE STATE OF DELAWARE
 P.O. BOX 500
 GEORGETOWN, DELAWARE
 19947. (S.C.I.)

THE ATTORNEY GENERAL FOR THE STATE
 OF DELAWARE, MR. CARL DAN BURGE
 820 n. FRENCH STREET
 WILMINGTON, DELAWARE 19801

PETITION-IN THE UNITED STATES DISTRICT COURT
 OF WILMINGTON DELAWARE FOR THE PURPOSE OF
CLAIM FOR RELIEF AND EMERGENCY HOSPITALIZATION FOR DAMAGE BOTH KNEE-CA

NOW COMES THE PETITIONER, MR. JEFFREY ALONZO SIMMS,
 IN THE ABOVE CAPTION CASE, BEFORE THE CHIEF JUDGE SUE L. ROBINSON,
 AND CLERK OF THE U.S.D.C. MR. PETER T. DALLEO, THE PETITIONER, IS IN A
 CRITICAL STAGE OF ILLNESS, THE COMPLAINANT SHALL BE PROCESS, IN GOOD
 FAITH;

PLEASE BE ADVISED, A EMPLOYEE OF THE
 DEPARTMENT OF CORRECTION, MAY NOT IMPEDE OR UNREASONABLY DELAY THE ACCESS
 OF A CONFINED PERSON TO MEDICAL CARE (SMITH V. HONGISTO, 2 PRIS. L. RPTR.
 284 (N.E.CAL. 1973); DEAN V. YOUNG, 1 PRIS. L. RPTR. 19 (CAL. SUPER. CT. 1971)

THE PETITIONER COMES BEFORE THE
 CHIEF HONORABLE JUDGE SUE L. ROBINSON SO THAT THE RECORDS WILL DETERMINED
 THE CONSTITUTIONALTY, THE DEFENDANTS IN THE ABOVE CAPTION CASE HAVE COME TO
 A TORTIOUS IMMORALITY ACTION :

MAY IT PLEASE THE COURT ON AUGUST 17-2006
 THE PETITIONER DEMAND FOR RELIEF FROM THE CHAIN EVENT OF INJUSTICE!!!!!!
 WHILE IN THE DELAWARE STATE DEPARTMENT OF CORRECTION.

PETITIONER MR. JEFFREY ALONZO SIMMS #198625
 DELAWARE CORRECTIONAL CENTER
 1181 PADDOCK ROAD
 SMYRNA, DELAWARE 19977

(410-75477-60 PHONE)

MR. JEFFREY A. SIMMS

UNIT D-D-3EAST

DELAWARE CORRECTIONAL CENTER

181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

WILMINGTON DE 197

18 AUG 2006 PM 1 T



CHIEF HONORABLE JUDGE SUE L. ROBINSON, U.S.D.C.
CLERK OF U.S.D.C. MR. PETER T. DALLEO

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WIL. DEL.
LOCK BOX 18

844 KING STREET

WILMINGTON, DELAWARE

19801-3570

15501+351A